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August 13, 2020

Via CM/ECF

Honorable Daniel J. Stewart
United States District Court
Northern District of New York
James T. Foley U.S. Courthouse
445 Broadway, Room 112
Albany, New York 12207

Re: Gina L. Bianchi v. Michael C. Green, et al.
Civil Case No.: 1:18-cv-619 (GLS/DJS)
Our File No.: 2174-BI27

Dear Magistrate Stewart:

On or about June 18, 2020, we served Plaintiff's Second Set of Interrogatories on Defendant Green. Following several good faith attempts, Defendant's responses remain outstanding. Responses to these Interrogatories are critical to Plaintiff's claims.

At this time, we respectfully request a conference with the Court to discuss this discovery dispute. Thank you for your courtesies with regard to this matter.

Very truly yours,

John W. Bailey

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/elp

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Page 2

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